

June 19, 2026

Ohio Housing Finance Agency
Office of Multifamily Housing
2600 Corporate Exchange Drive, Suite 300
Columbus, Ohio 43231

RE: DESIGN AND ARCHITECTURAL STANDARDS COMMENTS

Dear OHFA Team:

We appreciate the opportunity afforded to provide feedback on the 2027 Design and Architectural Standards Draft as your team undertakes an update to your policies and procedures. Your willingness to accept feedback and work through clarity in the document is greatly appreciated. Our group of architects has reviewed the current Design and Architectural Standards and the new Process Manual in relation to the numerous new construction and renovations projects we have in progress and would like to provide the following feedback.

The DAS document adopts a number of items that we found helpful to have cleared up and believe are on the right track in relation to the goals of providing more affordable housing more efficiently in the state including:

- Flexibility in the requirements for the number of Section 504 Mobility Units (Page 10 – G5), especially for rehabilitation projects, is helpful.
- Green Certification program changes as a recommendation are helpful, a number of other funding sources may require them, but this gives us flexibility to do what is best for each project.
- Clarifications around the appliance landing zone are helpful (page 16 – N3.6.4).
- The modification for the cabinet requirements, removing plywood frame (Page 17 – N3.9.2) will help open up more manufacturers for use of their cabinets, allowing projects to get more competitive pricing.
- Gypsum board modifications and simplification with the elimination of PGB create a more standard and streamlined approach that aligns with traditional construction practices.
- Acknowledgement of and flexibility with the 34" range height requirements based on the industry moving away from manufacturing these products is appreciated.
- Allowing carpet in select areas in senior projects is feedback we consistently get when meeting with residents of buildings. This is a positive change for the occupant's comfort in the building.
- We believe the enhanced description around comparable storage in accessible units is helpful. This can still be a limiting factor in standard units that might hold back the designs' full potential, but this moves us closer to the flexibility desired by designers.
- The document scales back the landscaping, fencing, and screening requirements (including for refuse collection stations being enclosed) which would give designers the flexibility to respond to local zoning codes and site conditions better.

A few of the revised items in the document might benefit from having additional clarity:

- The new DAS lists 10% of units needing to meet Section 504 (in most cases). Is this intended to be a true 10% or the recently enforced 5% rounded up plus 5% rounded up?
- The definition of "...full-height shelving..." (Page 15 – N3.3.4.2) could use some clarity around what is expected to be provided with either a set number of shelves or a dimension that would qualify for "full-height". Typically, we would provide a closet with 5 shelves to accommodate linen or pantry items with a total closet height of 8'.
- Landing zones (Page 16 – N3.6.4) could also occur on an island across from an appliance based on many of the kitchen layouts we are currently designing. Modifying the language to allow "adjacent to or immediately across from" would be helpful.

The DAS still contains many items that we are concerned are obstacles for our projects to be done in a cost effective and time sensitive manner. A few items don't feel like they belong in the DAS and might be dropped or placed in the QAP.

- Architectural license number and design firm registration number (Page 8 – G3) seem unnecessary to list in the DAS. These are required for submission to the building department for permitting and often our 80% sets are not yet ready to be stamped for plan review and construction (typically 95% set of drawings). A requirement in the QAP for developers to use licensed architects would seem to be a better place to list these requirements.
- Listing of the building code (Page 8 – G4) and specifically calling out ANSI/ICC A117.1-2017 is in conflict with the following text related to Section 504. It would be better to just list the current Ohio Building Code and/or Ohio Existing Building Code without additional text reference to specific requirements. The codes are subject to regular update and could become in conflict with the DAS standard when unnecessary information is added to the DAS.
- The new additional features chart (Page 11) provides a good mix of flexibility, but our development partners are concerned about the costs associated with each item in Column A2. The up-front costs of those specific items seem to be disproportionately higher than the remaining columns. Additionally, our initial review of some items in Column B may conflict with the goals and requirements of Fair Housing or Section 504 compliance. Further investigation will need to be studied into their impact.
- The site selection requirements (Page 14 – N3.1.1) referencing 24 CRF 988.55(e) would be a better fit for the QAP when the project is starting to be formed by the developer rather than by the architect, who is most often given the specific site to work with prior to starting.
- In discussions with many of our developers, mostly on family housing development, the requirement for roll-in showers for all Section 504 units (Page 15 – N3.5.3; Page 25 – R4.5.1) disadvantages their market position when they are leasing units to non-mobility impaired residents. Given the additional 504 units required by the DAS above accessibility standards, this compounds a problem that they are not seeing a market need for. A suggested alternative would be to allow the second 5% of the 504 units to be accessible tubs in family developments to better accommodate the needs of families with children.
- Countertop language could be further clarified (Page 16 – N3.5.5) by not specifically listing PLAM and allowing a multitude of countertop materials. We believe this has been the previous intent and that the not just need further refinement. The clarity provided on the corner requirements is helpful and will lead to cost savings on projects.

Design and Architectural Standards Comments

- Interior door width requirements (Page 16 – N3.7.1.1) could use additional clarity if this is for all interior doors or only doors to units, bedrooms, and bathrooms. Closets, linen closets, mechanical closets and pantries may need clarification.
- Equipment change requirements (Page 19 – N3.10.2.5) is difficult to meet with currently available systems without adding square footage to the units. In most cases, developers are pushing us to meet the listed minimum square footage for the apartment units. To accommodate this requirement, we would most likely further carve out space from the living room of the apartment unit to control construction costs.
- Light switch requirements (Page 19 – N3.10.3.2) with the listed types are at a higher cost than standard light switches, multiplied many times over for the amount of switches in a typical project.
- Outlet heights (Page 19 – N3.10.3.3) at a minimum of 18" A.F.F. exceeds accessibility and code requirements. If keeping this requirement, additional clarity is needed as to where the 18" measurement is to be taken from (center of box? Center of bottom outlet?).
- Rehabilitation requirements for storage space (Page 25 – R4.3.4) may be difficult to meet in many moderate A and B rehab in which walls are not anticipated to be modified. To meet these requirements, additional construction would mostly likely be required and would cut down on usable living space within the units. To provide detailed exception requests for each nonconforming existing closet can be a burdensome effort to both the design team in preparing and the OHFA staff in reviewing and responding.
- Energy Star Window V6 (Page 27 – R4.9.3.5) are very difficult and expensive to meet on renovation projects utilizing historic tax credit programs. The National Parks Standards are very strict on window replacement requirements and meeting the shapes, profiles, and materials of the historic windows when known. For manufacturers to produce, test, and certify these custom windows to meet both historic and Energy Star standards is an extreme cost burden to the project. Additionally, this section notes that the "rating for climate zone 5" is to be used for windows however AHRAE has parts of southern Ohio listed in 4A.

The new Process Manual is a very helpful document in its new form as a stand-alone item as well as the way the document is formatted. This will more easily help us both internally and with our engineering partners on projects. A few minor items to consider related to the DAPM:

- Color-coded floor plans (Page 4) have been added for both the initial submission and the final submission as a new requirement. This addition appears to be related to another layer of information to demonstrate building areas in addition to listing them in the drawings and in the DCF form. This additional work, subject to continual updating during the project, is an additional burden design teams to produce at the deadlines. We do not typically produce these on a project for final application level drawings and would need to add this time to the process. It would be helpful to know what OHFA uses these for.
- The submission calendar for the 9% program is challenging to meet from a design and engineering perspective. Most of the development partners we work for will not start our services until an award has been secured to move the project forward. The current mid-May announcement typically leads to our design team starting work in June, with the final application submission of 80% drawings in mid-September. Having an abbreviated submission requirement for final application (targeting 60% drawings that allow for firm contractor pricing), with a

commitment to follow up with 100% construction documents prior to construction (often the following summer), would reduce the need for extensive review letters. A refined DAS with critical items highlighted would be the guide of focus for the Final Application submission. We believe this would provide a better balance of the owner making the necessary investments to fund the design and getting your agency the critical information they need to be comfortable with the project. The experience and capacity reviews being completed prior to application should be helpful in ensuring that the project team is adequate to deliver the necessary standard of work for awarding credits.

- Providing AutoCAD files with the Final Application submission has become a challenge in many of our design workflows in which we are now producing the documents in Revit. We typically need to allocate a minimum of one day to convert these files and add the necessary area lines, a time and cost that we must pass along to the owner. Areas are clearly listed in the drawings and the various submission forms.
- The additional documentation required for HOME and NHTF (Page 7) seems to be an unnecessary addition to the DAPM. These programs have their own rules and requirements that are continuing to change and evolve. To memorialize and summarize their rules in an OHFA document, where this document may not keep up with the modifications by other entities, will only create confusion on what needs to be done.

Thank you again for your willingness to obtain multiple levels of feedback and we look forward to continuing working with your team to deliver more affordable housing units that are critically needed within our communities.

Sincerely,

CITY ARCHITECTURE

A handwritten signature in black ink, appearing to read 'Mathew Spencer', with a long horizontal flourish extending to the right.

Mathew Spencer
Principal

Copies To: File